

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 1:23-cr-00535
)	
Plaintiff,)	JUDGE CHRISTOPHER A. BOYKO
)	
vs.)	
)	
DANIEL KOVACIC,)	<u>DEFENDANT'S THIRD MOTION FOR</u>
)	<u>EXTENSION OF TIME TO FILE</u>
Defendant.)	<u>REPLY BRIEFS IN SUPPORT OF</u>
)	<u>PRETRIAL MOTIONS</u>

Now comes Defendant Daniel Kovacic, by and through his undersigned counsel Marisa L. Serrat, and hereby respectfully requests this Honorable Court to grant the defense an additional extension of time until February 28, 2025 to file Reply Briefs in Support of the Defendant's Pretrial Motions (R. 41, R. 42, and R. 43). Defense counsel had surgery on January 20, 2025 and has been medically recovering. Counsel has discussed this request with AUSA Brian S. Deckert who has indicated that the government does not oppose this request. Counsel needs additional time to discuss the government's response(s) in opposition with the Defendant, who is currently incarcerated at NEOCC in Youngstown, Ohio. Counsel has been unable to drive as part of her recovery. This request for an extension of time is made in good faith and for the purpose of promoting the ends of justice.

Respectfully Submitted,

s/ Marisa L. Serrat
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CERTIFICATE OF SERVICE

I hereby certify that on February 13, 2025, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/ Marisa L. Serrat
JAIME P. SERRAT LLC
Marisa L. Serrat, (#00888410)